

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-202
)	
JACK ULRICH)	

GOVERNMENT’S POSITION WITH RESPECT TO SENTENCING FACTORS

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Carolyn J. Bloch, Assistant United States Attorney for said district, and submits the following:

The government has reviewed the contents of the Final Presentence Investigation Report (PSR) filed in the above-captioned case, and respectfully submits that paragraph 55 of said report should be amended to include the following statutory language:

A term of imprisonment of not more than 20 years, but if the defendant has a prior conviction under Title 18, United States Code, Chapter 110, Chapter 77, Chapter 109A, Chapter 117 or under Section 920 of Title 10, or under the laws of any state relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, such person shall be fined under this title and imprisoned not less than 10 years nor more than 20 years.

The government further submits that the defendant’s prior conviction, referenced at paragraph 33 of the PSR, is a prior qualifying conviction “under the laws of any state relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child

pornography”, and as such, the defendant should be sentenced under the enhanced statutory provisions.

Respectfully submitted,

SCOTT W. BRADY
United States Attorney

/s/ Carolyn J. Bloch
CAROLYN J. BLOCH
Assistant United States Attorney
U.S. Post Office and Courthouse
700 Grant Street
Suite 4000
Pittsburgh, Pennsylvania 15219
(412) 894-7319 (Phone)
(412) 644-4549 (Fax)
Carolyn.Bloch@usdoj.gov
PA ID No. 53430